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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA
PRESCOTT DIVISION

EQUAL EMPLOYMENT	}	Case No.: TBA
OPPORTUNITY COMMISSION,		COMPLAINT
Plaintiff,		JURY TRIAL DEMANDED
vs.		
RV FUN, INC., an Arizona corporation,		
d/b/a COWBOYS RV MART,		
Defendant		

NATURE OF THE ACTION

This is an action under Titles I and V of the Americans with Disabilities Act of 1990 (“ADA”) and Title I of the Civil Rights Act of 1991 to correct unlawful employment practices on the basis of disability and to provide appropriate relief to Christiaan C. Calhoon, who was adversely affected by such practices. The Commission alleges that RV Fun, Inc. (“RV Fun”) discriminated against Mr. Calhoon on the basis of his disability, Attention Deficit Disorder (“ADD”), when it denied him a reasonable accommodation in his position of Recreational Vehicle (RV) Cleaner and Washer and when it discharged him because of his disability and because he requested a reasonable accommodation.

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PRAYER FOR RELIEF

Wherefore, the Commission respectfully requests that this Court:

- A. Grant a permanent injunction enjoining Defendant RV Fun, its officers, successors, assigns, and all persons in active concert or participation with it, from engaging in those actions alleged in paragraph 10 and any other employment practice which discriminates on the basis of disability.
- B. Order Defendant RV Fun to institute and carry out policies, practices, and programs which provide equal employment opportunities for qualified individuals with disability, and which eradicate the effects of its past and present unlawful employment practices.
- C. Order Defendant RV Fun to make whole Christiaan Calhoon by providing appropriate back pay with prejudgment interest, in amounts to be determined at trial, and other affirmative relief necessary to eradicate the effects of its unlawful employment practices, including but not limited to institution of training programs which educate employees about disability and anti-discrimination laws and transmission of a letter of apology to Christiaan Calhoon.
- D. Order Defendant RV Fun to make whole Christiaan Calhoon by providing compensation for past and future nonpecuniary losses resulting from the unlawful practices complained of in paragraph 10 above, including emotional pain, suffering, inconvenience, loss of enjoyment of life, and humiliation, in amounts to be determined at trial.
- E. Order Defendant RV Fun to pay Christiaan Calhoon punitive damages for its malicious and reckless conduct, as described in paragraph 10 above, in amounts to be determined at trial.
- F. Grant such further relief as the Court deems necessary and proper in the public interest.
- G. Award the Commission its costs in this action.

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The Commission requests a jury trial on all questions of fact raised by its

RESPECTFULLY SUBMITTED, this 30th day of June, 2006,

JAMES L. LEE
Deputy General Counsel

GWENDOLYN YOUNG REAMS
Associate General Counsel

EQUAL EMPLOYMENT
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